

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

APRIL KIMBROUGH,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NUMBER: 1:17-cv-00774-WSD
LYLE WEIDNER, QUALITY)	
CARRIERS, INC., and OLD)	
REPUBLIC INSURANCE)	
COMPANY,)	
)	
Defendants.)	

DEFENDANTS' DISCLOSURE OF EXPERT WITNESSES

COME NOW Defendants Lyle Weidner, Quality Carriers, Inc. and Old Republic Insurance Company ("Defendants"), and in accordance with Federal Rule of Civil Procedure 26 and this Court's Scheduling Order, hereby provide the disclosure of expert testimony and identify the following expert witnesses who Defendants may use at trial to present evidence under Fed. R. Evid. 702, 703, and 705, as follows:¹

¹ This disclosure shall also serve as Defendants' Supplemental Responses to Plaintiff's First Interrogatories and First Request for Production of Documents to the extent such discovery requests the identification of expert witnesses who may testify at trial.

1. Dr. Hal Silcox, III, M.D.
Peachtree Orthopedics
5505 Peachtree Dunwoody Road
Suite 600
Atlanta, Georgia 30342

Defendants identify Dr. Silcox to provide testimony as an expert in the areas of orthopedic treatment and surgery, as outlined in his attached expert report and based on his analysis and review of the medical records, including MRI films, of Plaintiff April Kimbrough as the records relate to his areas of testimony. Defendants expect Dr. Silcox to analyze and interpret the medical records in this case, both with regard to the crash that occurred and the alleged injuries of Plaintiff April Kimbrough. Dr. Silcox will base his opinions on his education, training and experience.

Dr. Silcox's work in this case may be continuing, and Defendants reserve the right to supplement, amend, revise and/or expand this disclosure, and to have Dr. Silcox supplement, amend, revise and/or expand his written report. Defendants further reserve the right to supplement Dr. Silcox's opinions, and the bases for those opinions, after receipt of: new or supplemental discovery; or any supplemental or rebuttal reports, disclosures or opinions by Plaintiff's experts.

Dr. Silcox's written report, his *curriculum vitae* containing a listing of his publications, testimony history and statement of compensation are attached. Defendants' agree to make Dr. Silcox available for deposition.

2. William L. Ronning, J.D. M.B.A.
Coastal Medical Billing
1934 E Montgomery Cross Rd
Savannah, GA 31406

Defendants identify Mr. Ronning to provide testimony in the areas of medical billing and auditing, as outlined in his attached expert report based on his review of Plaintiff's medical bills and discovery responses. Defendants expect Mr. Ronning to analyze and interpret Plaintiff's medical bills in this case, both with regard to their reasonableness and customariness in the medical industry. Mr. Ronning will base his opinions on his education, training and experience

Mr. Ronning's work in this case may be continuing, and Defendants reserve the right to supplement, amend, revise and/or expand this disclosure, and to have Mr. Ronning supplement, amend, revise and/or expand his written report. Defendants further reserve the right to supplement Mr. Ronning's opinions, and the bases for those opinions, after receipt of: new or supplemental discovery; or any supplemental or rebuttal reports, disclosures or opinions by Plaintiff's experts.

Mr. Ronning's written report, his *curriculum vitae* containing a listing of his publications, testimony history and statement of compensation are attached. Defendants' agree to make Mr. Ronning available for deposition.

Dated this 8th day of August, 2017.

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ J. Marshall "Buzz" Wehunt

R. SCOTT MASTERSON

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CERTIFICATE OF FONT

The undersigned counsel for Defendants Lyle Weidner, Quality Carriers, Inc. and Old Republic Insurance Company hereby certifies that the within and foregoing was prepared using Times New Roman 14-point font in accordance with Local Rule 5.1.

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ J. Marshall “Buzz” Wehunt

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **Defendants' Expert Disclosures** using the CM/ECF system which serves a copy of same upon all parties to this matter via electronic service as follows:

Alfred L. Evans, III
Evans Litigation & Trial Law, LLC
1447 Peachtree Street, NE
Suite 540(b)
Atlanta, GA 30309

Attorneys for Plaintiff

This 8th day of August, 2017.

LEWIS BRISBOIS BISGAARD & SMITH, LLP

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